## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

IN RE 2014 RADIOSHACK ERISA LITIGATION	) ) ) MASTER FILE NO. 4:14-cv-00959-O
THIS DOCUMENT RELATES TO:	)
ALL ACTIONS	)
	)
	)

## DEFENDANT WELLS FARGO BANK, N.A.'S RESPONSE TO PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY

Defendant Wells Fargo Bank, N.A. ("Wells Fargo") submits this brief response to Plaintiffs' Notice of Supplemental Authority (Dkt. 122) ("Notice") to notify the Court that Wells Fargo refuted the arguments asserted in Plaintiffs' Notice in Wells Fargo's Reply Brief in Support of Defendant Wells Fargo Bank, N.A.'s Motion to Dismiss the Amended Consolidated Class Action Complaint. (Dkt. 124 at 8, n.8.)

Dated: November 18, 2015

Respectfully Submitted,

By: /s/Michelle Hartmann
Michelle Hartmann
mhartmann@sidley.com
SIDLEY AUSTIN LLP
2001 Ross Avenue, Suite 3600
Dallas, TX 75201

Tel: (214) 981-3300 Fax: (214) 981-3400

Howard Shapiro (admitted *pro hac vice*) howshapiro@proskauer.com
Stacey C.S. Cerrone (admitted *pro hac vice*) scerrone@proskauer.com
PROSKAUER ROSE LLP

650 Poydras Street, Suite 1800

New Orleans, LA 70130

Tel: (504) 310-4085

Fax: (504) 310-2022

Russell L. Hirschhorn (admitted *pro hac vice*)

rhirschhorn@proskauer.com

PROSKAUER ROSE LLP

Eleven Times Square

New York, NY 10036

Tel: (212) 969-3286

Fax: (212) 969-2900

Anne E. Rea (admitted *pro hac vice*)

area@sidley.com

SIDLEY AUSTIN LLP

One South Dearborn Street

Chicago, IL 60603

Tel: (312) 853-7156

Fax: (312) 853-7036

Counsel for Defendant Wells Fargo Bank, N.A.

## **CERTIFICATE OF SERVICE**

On November 18, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5 (b)(2).

/s/ Michelle Hartmann Michelle Hartmann